

medac Group Code of Conduct



Our Core Values and Beliefs

Who does the Code of Conduct apply to?

Our Code of Conduct forms the basis for our business dealings and interactions.

We are all personally responsible for meeting the high ethical standards that are set out in our Code of Conduct. Our Code of Conduct is mandatory for all of us.

Scope

It applies equally to members of the Executive Committee and employees of the entire medac Group.



Important

Our business activities must always be in harmony with our Code of Conduct, our guidelines and applicable law.

All employees can find out how the specific standards of the Code of Conduct should be applied in our Compliance guidelines.



Contact

If you have any questions about our Code of Conduct, please contact Compliance at any time: compliance@medac.de

For information about using our reporting system, see Section 12 of the Code of Conduct and the following link: bkms-system.com/medac



All employees of the medac Group can find out how the specific standards of the Code of Conduct should be applied in our Compliance guidelines. **If neither the Code of Conduct nor the guidelines can provide you, as an employee of medac, with a suitable answer, please contact your Compliance team directly.**

Even apparently minor infringements can lead to serious consequences for our company, the employees involved and the executive committee (including severe fines, compensation, loss of public contracts, damage to reputation). Any violations of our Code of Conduct are thoroughly investigated and, depending on the severity, may lead to measures being taken under employment law.

The task of the medac Group is to make essential therapies accessible and, in so doing, to improve people's health – today and tomorrow. We are committed to this aim as a global company. We regard health as the most valuable resource of all and **put people at the heart of our mission**.

We focus our **expertise** on providing patients, medical personnel, laboratories and hospitals with **products of the highest quality**. We set ourselves **the highest moral standards** to exceed the ordinary for our customers and partners, **motivated** by our inner drive. We manage this thanks to our strong relationships. This is why we invest so much energy in our **joint collaborations**.

The **trust** that our patients and business partners place in us is based on these core values. Our **good reputation** and the **commercial success** that we have achieved together and want to preserve in the future stem from our sense of responsibility and integrity.

We have set out the ethical principles for our business dealings and interactions for all parties in our Code of Conduct. All of us – the Executive Management and employees – share the responsibility of upholding the applicable law and our Code of Conduct in our work. This is why the Code of Conduct forms part of our employment contract. The Code of Conduct helps us make appropriate and correct decisions relating to the medac Group in our day-to-day activities, particularly in difficult situations. If you are ever uncertain, seek advice from your line manager or the medac Compliance team.

Thank you for upholding our ethical standards and for contributing to the commercial success that allows us to continue improving people's health in the future.

Your medac Group



Frank Lucaßen
CEO

Frank Generotzky
COO

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A close-up photograph of a woman with dark hair, smiling warmly with her eyes closed. A young girl with dark hair is leaning in and kissing her on the cheek. The woman is wearing a light blue ribbed sweater. The background is a soft, out-of-focus outdoor setting.

1

Focus on patients

The wellbeing and safety of patients are our top priorities.

Our patients are at the heart of everything we do. Our products are used for the reliable diagnosis and effective treatment of illnesses. We focus all of our business activities, from development through to the marketing of our products, on our top objective: to improve the quality of life of patients - today and tomorrow.

1.1 Quality in research, development and production

We stand for high-quality products. All of our scientific and clinical research work is performed to the highest medical and scientific standards. We therefore observe all applicable laws and regulations during our research and in the development of our products, in particular Good Laboratory Practices (GLP) and Good Clinical Practices (GCP).

We ensure that the integrity and quality of the study data that we collect during development and research is always safeguarded by us.

We strictly adhere to all applicable regulations during the production of our products, in particular the Good Manufacturing Practices (GMP) and our internal quality standards. We also ensure that our suppliers observe the relevant standards.

At all times, any employee of the medac Group who notices that the quality standards are not being upheld is required to report this to the employee responsible for the relevant SOP.

1.2 Patient safety

We constantly monitor, review and assess all information concerning the safety of our products and are committed to taking any action necessary to ensure patient safety.

1.3 Collaboration with patients and patient organisations

Collaborations with patients and patient organisations can provide important exchanges of information. However, such collaboration is a sensitive area, as we are required to comply with particularly high ethical standards and maintain all applicable laws, guidelines and industry codes. Such collaboration must not result in, or give the impression of, undue influence being exerted on patients or patient organisations or that medac does not respect the neutrality or independence of the patient organisations.



Important

Employees of the medac Group who learn about complaints or quality problems relating to a medac product – either privately or through work – must immediately report this to the Complaint Management department (complaints@medac.de).

Reports or information about side effects/adverse drug reactions (ADRs) following the use of our products must be reported by all employees to the Pharmacovigilance department immediately, for example by email to drugsafety@medac.de.



Summary

We conduct research and development work in accordance with the highest medical and scientific standards and immediately report side effects, complaints or quality issues relating to products to the responsible department.

We respect the independence of patient organisations and do not exert any undue influence on their activities.

2

Collaboration with healthcare professionals

We respect the independence of healthcare professionals and their freedom to choose treatment plans.

Our collaboration with healthcare professionals and their institutions must never compromise or unfairly influence their medical independence or their therapy, prescription or procurement decisions. Such compromise or unfair influence must never even be suggested.

We will not accept or tolerate any collaboration with healthcare professionals that violates our rules. This would not only harm the reputation of our company, but may also violate anti-corruption law (§§ 299b, 331 ff. of the German Criminal Code) as well as the Drug Advertising Law and the law against unfair competition. It could also contravene the principles of the code of conduct of AKG e.V. [Pharmaceuticals and Cooperation in Healthcare] or the VDPH e.V. code of conduct of the diagnostics industry, by which we are bound.

There may be financial losses for the company and consequences for the employees involved under criminal and employment law.

2.1 Consulting services

We engage the services of healthcare professionals only in order to pursue a permitted, materially justified business objective. Such services may take the form of consulting services, advisory boards or speaker activities, for example. We document all collaboration work.

Remuneration must be at the market rate and appropriate to the service provided. Such collaboration must also comply with the applicable laws and codes of conduct and international regulations.

In particular, it is vital that our collaboration does not unfairly influence treatment, prescription or procurement decisions or give the impression such influence has been exerted.

2.2. Support for research projects

When supporting third-party research projects or studies, we ensure the independence and scientific integrity of the research is maintained. If the third-party research pertains to our own products, then our support must influence neither the design nor the outcomes of the research.

We support non-interventional trials (observational studies) only if the trial has a robust scientific objective and satisfies all requirements of the applicable laws, industry codes and international regulations to which we are bound.

2.3 Grants, sponsorship and benefits

Grants, gifts and invitations issued to healthcare professionals are a sensitive area. We never issue grants, gifts or invitations in order to influence therapy, prescription or procurement decisions.

Without exception, we only issue gifts and grants if this is expressly permitted in the guideline 'Collaboration with Healthcare Professionals' and if it is not prohibited by law. This even applies to very minor grants or gifts. We document all grants and gifts in accordance with our internal guidelines.

We endorse further training for professionals in order to promote effective and appropriate use of our products. We only support those training events that have a clear and relevant educational content.

We also make donations to institutions or organisations in healthcare (e.g., hospitals, professional bodies) only if these cannot give the impression that such donations could influence treatment, prescription or procurement decisions or recommendations made by the institution or organisation.

2.4 Marketing

Our educational and promotional activities aim at informing healthcare professionals about the properties and therapeutic value of our products and how they are used. As such, we market our products in accordance with all applicable laws and industry codes. We take particular care to ensure our statements about our products are correct, balanced and are not misleading. We only use documents and materials that have been internally approved within the company.

We only issue promotional products and samples to healthcare professionals to the extent that this complies with applicable laws and industry codes.



Info

For more information and policies concerning collaboration with healthcare professionals, see our guideline on 'Collaboration with Healthcare Professionals'.



Summary

We only collaborate with healthcare professionals to achieve legitimate business objectives and not to influence treatment, prescription or procurement decisions.

We observe the applicable laws and industry codes as well as the requirements of our own internal guidelines in any collaboration with healthcare professionals.

We consult with the Compliance department in cases of doubt.

A woman with long, wavy brown hair, wearing a light blue and white striped blazer over a white collared shirt, is engaged in a conversation. She is looking towards the right side of the frame. In the foreground, the hands and arms of another person are visible, gesturing as they talk. The background is a bright, out-of-focus indoor setting.

3

Collaboration with business partners

Integrity is at the heart of our work, helping to build the long-term trust of our business partners.

We want to achieve our business goals solely through legally and ethically sound methods. We are therefore committed to combatting corruption in all its forms. We always observe all applicable anti-corruption regulations.

Corruption does not just jeopardise the good reputation of our company, but can also lead to significant financial penalties for our business. The employees involved may face consequences under criminal, civil and employment law. We must therefore avoid any possible appearance of corruption.

3.1 Receiving and giving benefits

Receiving and giving gifts or invitations is a sensitive area. It is important to avoid even the suggestion that gifts could be used or intended to influence business decisions of the medac Group or our business partners. All of the donations we make are always permitted and transparent.

In case of doubt or whenever the situation requires approval, always contact Compliance before making or accepting any donation.

3.2 We do not bribe

Our actions must never give the appearance that we wish to unlawfully influence the business decisions of our business partners. As such, we do not promise or give our business partners any gifts to induce them into offering us or the medac Group a commercial advantage (for example in the form of a contract or favourable business terms). We never promise or offer business partners cash payments!

3.3 We do not accept bribes

We do not demand donations from third parties and do not accept any that may be used or intended to influence our business decisions.

3.4 Donations

Donations are voluntary and free grants to third parties for example in the form of money or material goods.

- When we make donations, we do not expect any service in return.
- We do not donate to political parties or individuals or organisations affiliated with them.
- Donations that are made to organisations in healthcare must be approved by Compliance, while donations made to organisations outside healthcare must be approved by the executive board of medac.

Examples

Of permissible benefits:

- Common, low-value promotional gifts (e.g., biro or calendar with company logo) with a market value of no more than 5 euro.
- Invitations to business meals that are held within an appropriate framework.

Of inadmissible benefits:

- Cash, valuable personal gifts such as a luxury watch.
- Personal favours, for example granting an interest-free loan or free home improvements.
- Invitations to a private holiday.
- Payment of travel costs for family members or friends to accompany professionals to training events



Info

For more information on anti-corruption in our dealings with business partners, please see our Business Partners guideline.



Summary

We do not promise or give our business partners or other third parties any gifts to induce them into offering us or the medac Group a commercial advantage (for example in the form of a contract or favourable business terms).

We do not demand or accept donations from third parties that may be used to influence our business decisions.

We do not make any donations to political parties or individuals or organisations affiliated with them.

We consult the compliance department in case of doubt.

4

Avoiding conflicts of interest

Decisions are based on objective criteria.

We separate our business interests from private interests.

It is important to us that our employees do not become engaged in any conflicts of interest. Conflicts of interest run the risk of commercial decisions being influenced by personal motives and thus no longer being made in the best interest of the company. In addition to the company's business interests, conflicts of interest can also harm our good reputation.

4.1 What is a conflict of interest?

A conflict of interest could occur when an employee's personal or financial interests are contrary to the interests of the medac Group. This can always be the case if personal, professional or commercial relationships exist between our employees and business partners of the medac Group.

4.2 Any close personal relationships in a business context must be reported

Our employees must make their business decisions based solely on objective criteria and must not be guided by personal relationships. Our business partners must be selected based solely on objective criteria such as quality, price and reliability.

Even the appearance of any conflict of interest must be avoided. Therefore any employees who have a close personal relationship with a business partner of the medac Group (e.g., a family relation) are not allowed to make any business decisions that involve that business partner (such as awarding contracts) without first notifying Compliance of these circumstances.

4.3 Sideline activities and holdings must be reported

Sideline activities or holdings in companies with which we have a business relationship or with which we are in competition could lead to a conflict of interest. Working with a business partner or a competitor outside the scope of medac employment or holding any shares in such companies.

A conflict of interest could occur in all of these cases. As such, we expect you to inform us openly of this kind of situation.

Examples

Of potential conflict of interest:

- A family member of an employee holds an important position at a hospital with which we have or intend to develop a business relationship.
- An employee holds share in a supplier's company of the medac Group.
- An employee intends to take up a consultant position as a side employment with a competitor.



Summary

We always base our decisions on objective criteria alone. We always separate the business interests of the medac Group from our private and own financial interests.

We immediately inform Compliance of any possible conflicts of interest.



5



Fair competition

We are committed to the principles of free and fair competition.

We are committed to free and impartial competition. We draw solely on our own strengths in competition with other companies and rely on our high-quality and innovative products to convince our customers.

We comply with competition and monopoly laws. Infringements of these laws may lead to serious consequences for our company and the employees involved. In addition to severe fines for the company and the employees involved, the company may also face compensation claims from customers or competitors, exclusion from public contracts and loss of reputation.

5.1 What do antitrust laws prohibit?

Antitrust laws serve to protect free and fair competition. As such, agreements between market actors seeking to restrict competition are banned, for example by

- fixing prices or price components.
- dividing markets, customers or regions.
- boycotting specific competitors.

Also banned are any informal verbal agreements on competition parameters ('gentlemen's agreements'). The sharing of market-sensitive information is also banned between market players, i.e., such information that may offer indications on present or future market behaviour (prices, costs, customers, sales volumes, production capacities, and so on).

5.2 Appropriate ways of working with competitors

We do not take part in agreements with our competitors that are harmful to competition. If a competitor wishes to enter into an agreement with us (e.g., as part of a tender) or unilaterally share market-sensitive information with us, we must immediately and expressly distance ourselves from such actions. We then immediately inform Compliance of the incident.

5.3 Appropriate ways of working with our suppliers and customers

We are also bound by monopoly laws when it comes to our customers and suppliers. Agreements with them may be problematic if they contain certain obligations.

Info

For more information on monopoly law, see our Monopoly Law guideline.

Examples

Of abusing market power:

- A targeted price war strategy to force competitors out of the market.
- The purchase of a dominant product is tied to the purchase of a product with less market significance.

Of potentially problematic supplier or procurement obligations:

- Exclusive delivery to us or procurement from us.
- The regular reporting of sales and turnover figures to us by customers.
- Maintaining certain fixed prices or minimum prices by intermediaries on resale.



Important

The Legal department must therefore always be consulted before concluding any such contractual arrangements.



Summary

We always observe the applicable monopoly laws.

We do not take part in agreements with our competitors that are harmful to competition.

We never exchange market-sensitive information with our competitors.

We never misuse any dominating position in the market that we might hold.

We have contracts with business partners that do not reflect existing contract templates checked by the Legal department prior to conclusion.

We consult with Legal or Compliance if we are unsure whether an action may violate monopoly laws.

6

Combating money laundering and financing of terrorism

We comply with the law and collaborate with business partners in a spirit of integrity.

Money laundering and terrorist financing place significant challenges on lawfully operating businesses. We must address these challenges to ensure that we always operate within legal frameworks. We therefore take all necessary measures to avoid even the appearance of engaging in money laundering activities or financing of terrorism.

6.1 Correct handling of suspected cases of money laundering or financing of terrorism

Money laundering refers to unlawfully acquired money or assets being injected into the legal financial and economic system. Financing of terrorism refers to money or other funds being made available to terrorist organisations.

Companies can face significant financial penalties and loss of reputation if they become involved in money laundering or terrorist financing. Employees may face consequences under criminal and employment law.

If there is reason to suspect money laundering, financing of terrorism or similar situations (red flags) or if you are unsure, inform Compliance immediately. Place the transaction on hold until it has been approved by Compliance.

Examples

Of red flags:

- It is difficult to establish the identity of a contractual partner / customer or the beneficial owner.
- The business partner uses external third-party companies based in non-EEA countries to process payments.
- The business partner pays or wants to pay in cash.



Info

For more information on handling suspect cases of money laundering and terrorist financing, see our 'Guideline on Preventing Money Laundering'.

For further information about checking business partners, see our 'Guideline on Checking Business Partners'.



Summary

We verify the identity of our contractual partners before entering into a business relationship.

We contact Compliance immediately if we are suspicious or in any doubt.

A man with grey hair and a beard, wearing a dark polo shirt, is shown in profile, looking towards the right. He is standing in a warehouse or industrial setting, with cardboard boxes and shelving visible in the background. A large white number '7' is overlaid in the top left corner.

7

Export control and sanctions regulations

We observe national and international regulations and other restrictions under foreign trade law

The medications, diagnostic equipment and other preparations developed by us are exported to numerous countries. Likewise, in order to manufacture these products, we are dependent on other goods that we import from other countries. In both cases, export control regulations and foreign trade law may apply.

7.1 Obligations and bans under export control and foreign trade law regulations

Export control regulations and foreign trade law set out various regulations and obligations that we are required to observe. For example, there may be a ban or restrictions on the import or export of certain products (product-specific bans or restrictions). It may also be the case that we are not allowed to do business with companies from specific third countries (country-specific bans). The same may apply to individual persons who are listed in sanctions lists.

Violating these bans may lead to high financial penalties against our company. The persons involved may have to face financial or criminal consequences. Before conducting such imports or exports, we must always ensure that a transaction is permitted under export control regulations and foreign trade law. We must also ensure that we are allowed to trade with the respective company or person in the first place.

Examples

Of problematic cases under export control regulations:

- Potential business partners are headquartered in Belarus, North Korea or Iran for example.
- Potential business partners are listed in a sanctions list of the EU.



Info

For more information about checking business partners, see our 'Guideline on Checking Business Partners'.



Summary

We always check the sanctions list before entering into a business relationship.

We always perform export control on relevant product exports.

We contact Compliance if there is any doubt or we have questions.

A woman with short brown hair and glasses is looking at a laptop screen. She is wearing a teal blazer over a dark top. The background is blurred with warm, bokeh lights. A large white number '8' is in the top left corner.

8

Data protection

We handle the data entrusted to us responsibly.

Each day, we handle a large amount of data from our business partners and customers as well as our employees. We also come into contact with the health data of patients. Various data protection regulations exist to safeguard this data. This especially applies to patient data.

Violations of these regulations are not treated as trivial offences by the responsible authorities and courts but may instead lead to substantial fines. There is also the possibility of a negative impact on the company's image and compensation claims, particularly in the event of data protection breaches.

8.1 What is personal data?

Personal data is any data that can be used, directly or indirectly, to identify a person, e.g., name, date of birth, place of birth, health data, sick days, bank details, and so on. Even anonymised data is often deemed to be personal data and subject to data protection regulations.

Examples

Of infringements of data protection law requirements:

- An employee sends a doctor who has previously provided consulting services to medac marketing material without his or her consent.
- An employee uses anonymised patient data from a clinical trial for other purposes even though the consent of the patient under data protection law applies only to the clinical trial.
- An employee in the Procurement department forgets to delete the personal data of a supplier even though the business relationship with the supplier has permanently ended.



Important

We always observe the applicable data protection regulations and handle the data entrusted to us responsibly.



Summary

We handle the data entrusted to us responsibly.

We process personal data only on the basis of the consent of the person concerned or appropriate legal authorisation.

We contact Compliance in the event of questions or doubt.

9



Protection of trade secrets

Our expertise is the foundation of our business and must be protected.

The medac Group possesses valuable expertise and experience in the areas of oncology, urology and autoimmune disorders, which forms the foundation of our success and sets us apart from our competitors. Any unauthorised sharing or publication of our expertise or any other trade secrets could cause huge damage to us. We therefore take all necessary measures to protect our trade secrets.

9.1 What are trade secrets?

Our trade secrets include such information as preclinical and clinical study data, chemical formulas, compositions of substances, production methods, procurement sources, customer lists, sales figures, and balance sheets. Unauthorised disclosure of this company information is not permitted under any circumstances.

Examples

Of violations of trade secrets:

- An employee works on an internal presentation about a new development during a long train journey. Without his or her knowing, a passenger reads the presentation over his or her shoulder.
- An employee wants to continue working at home after business hours and copies a business development plan to an unencrypted USB stick. On the way home, the USB stick gets lost.
- An employee starts a new job with a competitor and takes documents that contain medac Group trade secrets, which he or she gives to the new employer.



Important

Employees who harm our trade secrets will face consequences under employment and civil law and, in the event of wilful disclosure, may be subject to criminal proceedings.



Summary

We never disclose our trade secrets to third parties without authorisation or involuntarily.

We take all necessary measures to protect our trade secrets.

We immediately report any unauthorised or involuntary disclosure of trade secrets to Compliance.



10

Respectful approach

We promote diversity and protect our employees against discrimination and harassment. We are respectful of our environment and handle natural resources sparingly.

We are committed to ensuring an atmosphere of respect among our employees and towards our business partners and customers. For us, respect does not just mean being respectful to our colleagues. We are also responsible and sparing when it comes to our environment and the natural resources of our Earth.

10.1 Diversity and human rights

We promote diversity as a key component of our corporate culture and are committed to internationally recognised human rights. Our business, professional (and personal) decisions are taken without regard for skin colour, gender, language, religion, political or other convictions, ethnic or social background, birth or any other status. We fully reject forced labour, child labour and any other form of modern slavery.

By individually assuming social responsibility, we lay the foundations for a working environment free of discrimination. Reflecting on personal prejudices and role models is the basis for ensuring we interact with each other in a spirit of respect and consideration.

10.2 No discrimination or harassment

To ensure social responsibility is exemplified by all stakeholders (employer, employees and their deputies), we ensure that everyone understands what this responsibility means and that people act accordingly.

We do not tolerate any discrimination, harassment of any sort or any type of behaviour that insults, humiliates or otherwise devalues our employees. Any such behaviour is consistently punished and may lead to measures being taken under employment law. This also applies to postings on social media.

10.3 Environment

We consistently implement regional, national and international standards and minimise risks for people and the environment by regularly ensuring we adhere to the corresponding laws, provisions and directives as well as internal quality management systems. To continually improve our environmental performance, any activities that could have a negative impact on the environment are measured and assessed as part of our certified environmental management system (in accordance with DIN EN ISO 14001).

Examples

Of unacceptable behaviour:

- Employees are bullied by other employees based on their skin colour/religion/sexual orientation.
- Employees make a joke with sexual connotations to another employee during lunch.

Summary

We treat each other and our business partners with respect.

We do not tolerate any discrimination or harassment of any kind.

We are responsible and sparing when it comes to our environment.

We ensure that our suppliers are not involved in any human rights violations and that they maintain environmental standards.

We only work with suppliers who are not involved in any human rights violations and who maintain environmental standards.

11

Occupational health and safety

Through our corporate guidelines and our conduct, we actively contribute to a safe and healthy working environment.

Ensuring safe and healthy working conditions for our employees is one of our top priorities. We therefore abide by the applicable occupational health and safety provisions. By employing targeted measures to promote health and safety, we are committed to reducing the risk of occupational accidents and sickness. We have established a company integration management system to help ensure the long-term health of our employees, prevent work incapacity and offer preventative aids.

We also continually strive to make our work methods and processes even safer. Measures include conducting risk assessments pursuant to § 10 MuSchG [German Maternity Protection Act] to protect mothers at work and in training.

11.1 Occupational health and safety as a joint responsibility

In addition to the measures and precautions adopted by us to ensure occupational health and safety, every employee is responsible for promoting a safe and healthy working environment. This includes refraining from particularly hazardous and accident-prone behaviour. As such, it is forbidden to consume alcohol or drugs during working hours, during breaks and when on company premises. For more information, see the Works Agreement 'Addiction'. Employees are also responsible for proactively drawing attention to possible injury or accident risks (e.g., a defective machine).

Examples

Of unacceptable behaviour:

- Employees notice that individual roof tiles on a warehouse are loose. The employee leaves work without informing a line manager.
- Employees celebrate a colleague's birthday with alcohol during a lunch break.

Summary

We abide by the applicable occupational health and safety provisions.

We do not consume any alcohol or drugs during working hours, during breaks and when on company premises.

We actively help to reduce the risk of occupational accidents and sickness. We immediately notify Compliance of possible hazards and particular risks.

12

Reporting system

We offer employees and business partners a protected space and encourage them to play an active role in our reporting system.

To prevent harm to our company, we rely on the support of every employee. Each and every employee is therefore responsible for uncovering and preventing any potential violations of the law or our core ethical values. We expect our employees to report any potential violation of the law, violation of the principles of our Code of Conduct or violation of our guidelines.

If you do not wish to report a potential violation to your line manager or Compliance directly, you can also submit a report anonymously via our external reporting system. The reporting process is designed so that your identity remains strictly confidential if requested.

12.1 Protecting whistleblowers from reprisals

We would like to emphasise very clearly that whistleblowers will in no way be regarded as "traitors". On the contrary: whistleblowers help us ensure we are acting within the law and prevent damage to our company. The earlier any potential violation of laws or our Code of Conduct is reported, the better chance we have of limiting the potential damage to our company. We therefore protect all employees who in good faith report potential misconduct. This applies even if the report turns out to be unwarranted.

We will not protect those who, against their better knowledge, submit a false report of a violation in order to cause harm to another employee.

Examples

Of reportable violations:

- Violations of quality and reporting requirements with respect to our products
- Violations of our principles governing work with patients and patient organisations
- Violations of our principles governing work with healthcare professionals
- Corruption
- Violations of competition law
- Money laundering and financing of terrorism
- Violations of occupational health and safety provisions
- Violations of trade secrets
- Discrimination or harassment
- Violations of human rights
- Violations of environmental standards



Info

The reporting system is available in German, English and Czech and can be accessed as follows:

- Online via bkms-system.com/medac
- Via the medac website www.medac-group.com

It is available to employees of medac and to customers, business partners and all other external persons.



Summary

We report potential law breaking or violations of the Code of Conduct to the line manager or Compliance or alternatively via the reporting system.

We protect whistleblowers from negative consequences or reprisals by ensuring anonymity.

We take every report seriously. All reports are thoroughly and conscientiously checked.

At a glance

1 Focus on patients

We conduct research and development work in accordance with the highest medical and scientific standards and immediately report side effects, complaints or quality issues relating to products to the responsible department.

We observe the independence of patient organisations and do not exert any undue influence on their activities.

2 Collaboration with healthcare professionals

We only collaborate with healthcare professionals to achieve legitimate business objectives and not to influence treatment, prescription or procurement decisions.

We observe the applicable laws and industry codes as well as the requirements of our own internal guidelines in any collaboration with healthcare professionals.

3 Collaboration with business partners

We do not promise or give our business partners or other third parties any gifts to induce them into offering us or the medac Group a commercial advantage (for example in the form of a contract or favourable business terms).

We do not demand or accept benefits from third parties that may be used to influence our business decisions.

We do not make any benefits to political parties or individuals or organisations affiliated with them.

4 Avoiding conflicts of interest

We always base our decisions on objective criteria alone. We always separate the business interests of the medac Group from our private and own financial interests.

We immediately inform Compliance of any possible conflicts of interest.

5 Fair competition

We always observe the applicable monopoly laws.

We do not participate in agreements with our competitors that are harmful to competition.

We never exchange market-sensitive information with our competitors.

We never misuse any dominating position in the market that we might hold.

We have contracts with business partners that do not reflect existing contract templates checked by the Legal department prior to conclusion.

6 Combatting money laundering and financing of terrorism

We verify the identity of our contractual partners before entering into a business relationship.

7 Export control and sanctions regulations

We always check the sanctions list before entering into a business relationship.

We always perform export control on relevant product exports.



8 Data protection

We handle the data entrusted to us responsibly.

We process personal data only on the basis of the consent of the person concerned or appropriate legal authorisation.

9 Protection of trade secrets

We never disclose our trade secrets to third parties without authorisation, even involuntarily.

We take all necessary measures to protect our trade secrets.

We immediately report any unauthorised or involuntary disclosure of trade secrets to Compliance.

10 Respectful approach

We treat each other and our business partners with respect.

We do not tolerate any discrimination or harassment of any kind.

We are responsible and sparing when it comes to our environment.

We ensure that our suppliers are not involved in any human rights violations and that they maintain environmental standards.

We only work with suppliers who are not involved in any human rights violations and who maintain environmental standards.

11 Occupational health and safety

We abide by the applicable occupational health and safety provisions.

We do not consume any alcohol or drugs during working hours, during breaks and when on company premises.

We actively help to reduce the risk of occupational accidents and sickness. We immediately notify Compliance of possible hazards and particular risks.

12 Reporting system

We report potential law breaking or violations of the Code of Conduct to the line manager or Compliance or alternatively via the reporting system.

We protect whistleblowers from negative consequences or reprisals by ensuring anonymity.

We take every report seriously. All reports are thoroughly and conscientiously checked.



Info

We consult with the Compliance department in cases of doubt.

Contact

If there are any questions about our Code of Conduct,
please contact compliance@medac.de

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